

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IN RE: FANSTEEL INC., ET AL. <sup>1</sup> ,	)	
	)	
Fansteel Inc.	)	
	)	
Plaintiff	)	Civil Action No. 04-527 (JJF)
	)	
v	)	
	)	
Crossroads Bits & Sales, LLC	)	
	)	Adversary Case No. 04-51075 (PBL)
Defendant	)	Bankruptcy Case No. 02-10109 (JJF)

**AFFIDAVIT OF COUNSEL IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT  
JUDGMENT AGAINST CROSSROADS BITS & SALES LLC**

STATE OF DELAWARE            )  
  )       ss.  
COUNTY OF NEW CASTLE    )

The undersigned, being first duly sworn to oath, deposes and says based upon my knowledge, information and belief:

1. I am an attorney admitted to practice in the State of Delaware and before this Court.
2. I submit this Affidavit of Counsel in Support of the Plaintiff's Motion for Entry of Default Judgment Against Crossroads Bits & Sales LLC (the "Affidavit") pursuant to Fed. R. Civ. P. 55(b)(1), made applicable herein by Fed. R. Bankr. P. 7055. I am co-counsel for the above-captioned plaintiff (the "Plaintiff") in the adversary proceeding and have personal knowledge of the facts set forth in this Affidavit.

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<sup>1</sup> The Reorganized Debtors are the following entities: Fansteel Inc. and Wellman Dynamics Corp.

3. On or about January 12, 2004, the Plaintiff filed its Complaint for Avoidance and Recovery of Preferential Transfer (the "Complaint") against the defendant Crossroads Bits & Sales LLC (the "Defendant").

4. The Complaint seeks to avoid and recover, pursuant to 11 U.S.C. §§ 547 and 550, preferential transfers made to the Defendant in the amount of \$12,070.84.

5. The Summons and Notice of Pretrial Conference in an Adversary Proceeding (the "Summons") was dated January 13, 2004. The Summons stated that the Defendant was required to file a response to the Complaint on or before February 12, 2004.

6. On July 11, 2003, our office caused the Defendant to be served with the Complaint and the Summons in accordance with Fed.R.Bankr.P. 7004(b) (a true and accurate copy of the Complaint, the Summons, and the Certificate of Service is attached hereto as Exhibit

A). The Complaint and the Summons were mailed to:

(i) Crossroads Bits & Sales, LLC.  
Attn: Officer/Director/Manager/Partner  
7921 South Fork Road  
Pound, VA 24279

(ii) Mike Prichard, Registered agent for  
Crossroads Bits & Sales, LLC.  
7921 South Fork Road  
Pound, VA 24279

The Plaintiff received no returned mail from the United States Postmaster with respect to the address listed above.

7. The Certificate of Service was filed on January 13, 2004.

8. The Defendant failed to answer, move, or otherwise plead within the time required by the Summons. Further, to date the Defendant has failed to answer, move or otherwise respond to the Summons and Complaint.

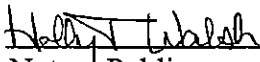
9. Upon information and belief, the Defendant is not an infant, an incompetent person, or in the military service.

10. Pursuant to Del. Bankr. L.R. 7055-1, a copy of the Plaintiff's Motion for Entry of Default Judgment Against Crossroads Bits & Sales, together with this Affidavit, is being served upon the Defendant at the address listed in paragraph 6 contemporaneously with the filing of the same with the Court.

11. I either have personal knowledge of the facts set forth, or I have undertaken an investigation of the Debtors' records and/or been informed by individuals with personal knowledge of the relevant events. In both instances, the facts set forth therein are true and correct to the best of my knowledge and belief.

  
James E. O'Neill

Sworn to and subscribed before  
me this 11<sup>th</sup> day of March 2005

  
Notary Public  
My Commission Expires: 02/11/06

**HOLLY T. WALSH**  
Notary Public - Delaware  
My Comm. Expires Feb. 11, 2006